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FILEDUNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOISJUL 30 2008
7-30-2008
JUDGE JOAN H. LEFKOW
UNITED STATES DISTRICT COURT

UNITED STATES OF AMERICA,)	
Plaintiff,)	
)	
VS.)	NO. 07 CR 843
Rondell Freeman)	
Defendant.)	Honorable Joan Lefkow

MOTION TO ADOPT PRE-TRIAL MOTIONS OF CO-DEFENDANT'S
AND TO
EXTEND TIME TO FILE MOTIONS TO SUPPRESS EVIDENCE

Now comes Rondell Freeman, by and through his attorney, Herb Goldberg and Associates, and moves this Honorable Court to enter an order allowing the defendant leave to adopt the pre-trial motions filed on behalf co-defendant's herein and to extend time for the filing of additional motions to suppress evidence, unique to Rondell Freeman. In support thereof the defendant states as follows:

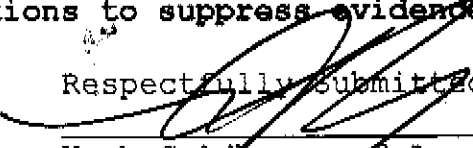
1. That the co-defendants herein have filed various motions including but not limited to motions for prior bad acts, lists of witnesses, grand jury transcripts, Santiago motions, agents notes, expert testimony and other matters already filed before this Honorable Court.

2. That Rondell Freeman hereby requests to join in said motions, as they apply to him.

3. That Rondell Freeman has reviewed all evidence herein tendered and desires an extension for filing further motions to suppress evidence unique to his case.

Wherefore, the defendant prays that his Honorable Court will grant his motion to adopt motions of co-defendants, and extend time to file additional motions to suppress evidence.

Respectfully Submitted by:


 Herb Goldberg and Associates
 Attorneys for Rondell Freeman
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